

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BOSTON BIT LABS, INC., d/b/a BIT BAR
SALEM, a Massachusetts corporation,

Plaintiff,

v.

MASSACHUSETTS GROWTH CAPITAL
CORPORATION, a Massachusetts body
politic and corporation,

Defendant.

Civil Action No. _____

**MOTION FOR A TEMPORARY
RESTRAINING ORDER**

Plaintiff Boston Bit Labs, Inc., d/b/a Bit Bar Salem (“Bit Bar”) brings its Motion for a Preliminary Injunction against Defendant Massachusetts Growth Capital Corporation (“MGCC” or “Defendant”) preventing MGCC from unconstitutionally excluding Bit Bar from eligibility, or even applying for a COVID-19 grant on account of BitBar having exercised its First Amendment right to Petition.

REQUEST FOR ORAL ARGUMENT

Plaintiff believes that oral argument may assist the court. This matter involved significant Constitutional issues that oral argument will help to address.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Undersigned counsel certifies that counsel for Plaintiff conferred with Defendant’s representative on October 26, 2020, and attempted in good faith to resolve or narrow the issue.

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Dated: October 27, 2020

Respectfully Submitted,

/s/ Marc J. Randazza

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